

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re: : Chapter 11
Joseph Klaynberg, :
Debtor. : Case No. 22-10165 (MG)
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**APPLICATION FOR ORDER APPROVING
THE APPOINTMENT OF CHAPTER 11 TRUSTEE**

**TO: THE HONORABLE MARTIN GLENN,
UNITED STATES BANKRUPTCY JUDGE:**

William K. Harrington, the United States Trustee for Region 2 (the “United States Trustee”) hereby applies to this Court pursuant to Rule 2007.1 of Federal Rule of Bankruptcy Procedure for an order approving the appointment of Jonathan L. Flaxer as Chapter 11 Trustee in this case and in support thereof, states the following:

1. On February 11, 2022, the Debtor filed a voluntary petition for relief under Chapter 11 of the Bankruptcy Code. ECF No. 1.
2. On August 17, 2022, Series 2020A of Nahla Capital LLC (“Nahla”) filed the Application for Appointment of Chapter 11 Trustee (the “Trustee Motion”). ECF No. 189. On September 7, 2022, the Debtor filed his Opposition thereto. ECF No. 214.
3. On September 14, 2022, the Court held a hearing on the Trustee Motion and granted it at the conclusion of the hearing.
4. On September 19, 2022, the Court entered the Memorandum Opinion and Order Granting Series 2020A Nahla Capital LLC's Motion for the Appointment of a Chapter 11 Trustee (the “Trustee Order”). ECF No. 230.

5. The United States Trustee received recommendations from Debtor counsel, counsel to Nahla, and candidates themselves.

6. After a careful review of the candidates' qualification and experience, the United States Trustee selected Jonathan L. Flaxer as the Chapter 11 Trustee in this case.

7. To the best of the United States Trustee's knowledge, Mr. Flaxer's experience, as well as his connections with the Debtor, creditors, any other parties-in-interest, their respective attorneys and accountants, the United States Trustee, and persons employed by the office of the United States Trustee, are set forth in the Declaration attached as Exhibit A.

WHEREFORE, the United States Trustee requests that the Court enter an Order Approving the Appointment of Jonathan L. Flaxer, as Chapter 11 trustee, and for such other and further relief as may seem just and proper in the above-described matter.

Dated: New York, New York
September 20, 2022

WILLIAM K. HARRINGTON
UNITED STATES TRUSTEE
Region 2

By: /s/ Tara Tiantian
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